

### **REMARKS/ARGUMENTS**

Applicants thank the Examiner for his careful review of this application. Claims 1-20 have been rejected. Claims 2, 7, 9, 15, and 20 have been canceled. Claims 1, 3, 8, 12-14, 16, and 19 have been amended. Applicants respectfully request reconsideration of the application in view of the above amendments and the following remarks submitted in support thereof.

#### **Obviousness Rejections under 35 U.S.C. §103(a)**

Pending claims 1, 3-6, 8, 10-14, and 16-19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,463,498 to Wakeley et al. in view of U.S. Patent No. 5,954,796 to McCarty et al. As will be fully explained below, the combination of Wakeley et al. in view of McCarty et al. does not raise a *prima facie* case of obviousness against amended independent claims 1, 8, and 14.

Although the Applicants believe that the original pending claims are defined over the prior art of record, the Applicants have amended independent claims 1, 8, and 14 to clarify that the independent claims define a method, a system, and a computer program for providing device type information using a Fibre Channel network. Additionally, Applicants have amended the independent claims to further define that a device entry associates an Arbitrated Loop Physical Address (AL\_PA) with a port target identifier and a logical unit identifier (LUN). The amended independent claims also define receiving a request for the device type information, wherein the request includes the port target identifier and the LUN.

In support of the 35 U.S.C. §103(a) rejection, the Examiner noted that Wakeley et al. teach or suggest a method, a system, and a computer program for providing the device type information using the Fibre Channel network as defined in canceled dependent claims 7 and

20, and incorporated into amended independent claims 1, 8, and 14 (see Final Office Action mailed on August 5, 2003 at page 6). Applicants respectfully traverse the Examiner's characterization of Wakeley et al. relative to amended independent claims 1, 8, and 14 because the portion of the reference relied upon by the Examiner (col. 8, lines 46-64) does not teach or suggest providing the device type information using the Fibre Channel network. Specifically, column 8, lines 46-49 teaches that "SCSI bus 416 is a parallel bus" and that "the number of data bits that can be simultaneously transported by the SCSI bus is referred to as the width of the bus." Furthermore, "the SCSI bus is controlled by a clock that determines the speed of operations and data transfer on the bus" (col. 8, lines 52-54). The rest of the portion then teaches about the "[d]ifferent types of SCSI buses" (col. 8, lines 58-59). Thus, column 8, lines 46-64 is merely a basic tutorial on SCSI buses. There is nothing in column 8, lines 46-64 that discloses a Fibre Channel network and teaches or suggests providing the device type information using the Fibre Channel network. As such, Wakeley et al. cannot reasonably be considered to place the public in possession of providing the device type information using the Fibre Channel network, as defined in amended independent claims 1, 8, and 14.

The Examiner also noted that Wakeley et al. teach or suggest the request that includes the port target identifier and the LUN, and associating the AL\_PA with the port target identifier and the LUN, as defined in amended independent claims 1, 8, and 14. Applicants respectfully traverse the Examiner's characterization of Wakeley et al. relative to amended independent claims 1, 8, and 14 because the portions of the reference relied upon by the Examiner (col. 6, lines 61-67; col. 7, lines 1-40; and col. 18, lines 38-67) do not teach or suggest the request that includes the port target identifier and the LUN, and associating the AL\_PA with the port target identifier and the LUN.

In particular, the Examiner first identified the port target identifier as “destination identifier (‘D\_ID’)” and identified the LUN as “source identifier (‘S\_ID’)” (Figure 3 and col. 6, lines 62-64). Thereafter, the Examiner noted that column 7, lines 6-40 teaches or suggests the request that includes the port target identifier and the LUN (see Final Office Action mailed on August 5, 2003 at page 2). However, if column 7, lines 6-40 teaches or suggests the request that includes the port target identifier and the LUN, then one would expect that column 7, lines 6-40 would mention the terms D\_ID and S\_ID. However, there is nothing in column 7, lines 6-40 that mentions D\_ID and S\_ID.

On the other hand, Wakeley et al. do mention a “logical unit number (“LUN”)” at column 7, line 18. However, if an argument is made that the LUN disclosed in Wakeley et al. is equivalent to the LUN defined in amended independent claims 1, 8, and 14, then the Examiner’s rational that column 18, lines 38-67 teach or suggest that the device entry associates the AL\_PA with the port target identifier and the LUN fails because column 18, lines 38-67 only discloses the relationship between AL\_PA, D\_ID, and S\_ID. There is nothing in column 18, lines 38-67 that mentions the term LUN. Thus, Wakeley et al. cannot reasonably be considered to teach or suggest the request that includes the port target identifier and the LUN, and associating the AL\_PA with the port target identifier and the LUN, as defined in amended independent claims 1, 8, and 14.

To establish a *prima facie* case of obviousness, the prior art references must teach or suggest all the claim limitations (see MPEP2143). Here, in view of the incorrect characterization of Wakeley et al., the references as combined do not teach all the features of the claimed invention. Since dependent claims 3-6, 10-13, and 16-19 directly or indirectly depend from amended independent claims 1, 8, and 14. Applicants submit that the dependent claims are patentable under 35 U.S.C. §103(a) for the reasons set forth above. As a result,

Applicants respectfully request the Examiner to withdraw the 35 U.S.C. §103(a) rejection for pending claims 1, 3-6, 8, 10-14, and 16-19.

**Conclusion**

In view of the foregoing, the Applicants respectfully submit that all the pending claims 1, 3-6, 8, 10-14, and 16-19 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is requested to contact the undersigned at (408) 749-6900 ext. 6924. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ADAPP171). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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